

# EXHIBIT 31

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1                   UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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5                   ~ ~ ~ ~ ~

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7   IN RE:   NATIONAL PRESCRIPTION       MDL No. 2804  
8   OPIATE LITIGATION

9  
10                  Case No.  
11                  17-md-2804

12                  Judge Dan Aaron  
13                  Polster

14   This document relates to:  
15   The County of Summit, Ohio, et al. v. Purdue  
16   Pharma L.P., et al.

17   Case No. 18-OP-45090 (N.D. Ohio)

18                  ~ ~ ~ ~ ~

19                  Videotaped Deposition of  
20                  STEVE PERCH  
21                  October 18, 2018  
22                  9:00 a.m.

23                  Taken at:

24                  Brennan Manna & Diamond  
25                  75 East Market Street  
                    Akron, Ohio

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1 flip to the next page, she's referring to that  
2 bar chart that we talked about a little bit  
3 earlier?

4 A. Correct.

5 Q. And again, I'm not going to ask  
6 lots of specific questions, but would you agree  
7 with me that the carfentanil deaths were  
8 largely in one time -- kind of point in time in  
9 2016 where you saw very significant deaths  
10 associated to carfentanil?

11 A. No.

12 Q. What -- did it occur after 2016?

13 A. I will agree with you that it  
14 started in the 4th of July weekend of 2016 and  
15 just ballooned for the rest of 2016. It didn't  
16 get any better. It got worse. And then 2017  
17 was just as bad.

18 Q. Okay.

19 A. So that year and a half was  
20 carfentanil. It was, you know, basically the  
21 carfentanil epidemic.

22 Now, prior to that, when I first  
23 started the coroner's office, as I mentioned  
24 before, I would see trends. You know,  
25 initially in the early 2000s, hydrocodone,

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1 oxycodone, and that lasted for years. I mean,  
2 you see peaks and valleys and spikes.

3 But typically what all I saw the  
4 first 10 years at the coroner's office were  
5 prescription meds. Very low levels of illicit  
6 drugs in terms of lethal nature. Most of our  
7 deaths -- and I don't have the statistics.  
8 This is just the perception I had.

9 Q. Uh-huh.

10 A. The first 10 years I'm there.

11 Then, the last 10 years, I saw some  
12 fluctuations. You know, the prescription -- as  
13 I mentioned, we had pain management centers  
14 back then, quite a few of them. As a matter of  
15 fact, my last few years at City Hospital I  
16 created a special drug test aimed at pain  
17 management centers where I incorporated the  
18 things that they wanted to see, which is the  
19 opiates: oxycodone, hydrocodone, Fentanyl,  
20 methadone, et cetera. And we called it the  
21 pain management panel.

22 We originally created it for  
23 St. Thomas Hospital. And after several weeks,  
24 we were getting calls from Cleveland Clinic,  
25 Aultman Hospital. Cleveland Clinic would have